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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF WITHDRAWAL OF  
OBJECTION TO PLAN  
CONFIRMATION BY THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
[Relates to Dkt. Nos. 7306 and 7509]**

1       **PLEASE TAKE NOTICE** that on May 15, 2020, the Official Committee of Tort  
2 Claimants (the “**TCC**”) filed an objection (“**Objection**”) to confirmation of the plan proposed by  
3 PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**”) and the  
4 Shareholder Plan Proponents [Dkt. No. 7306] (the “**Plan**”), based on five issues listed on Exhibit 2  
5 to the Objection;

6       **PLEASE TAKE FURTHER NOTICE** that on May 22, 2020, the TCC filed a reply brief  
7 (the “**Reply**”) responding to plan objections filed by other parties in interest, addressing the TCC’s  
8 position and concerns pertaining to responsive language that may appear in a future amended  
9 version of the Proposed Findings of Fact, Conclusions of Law, and Order Confirming Debtors’ and  
10 Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization filed on May 26, 2020 [Dkt. No.  
11 7581] (the “**Confirmation Order**”), or in any amended Plan; and

12       **PLEASE TAKE FURTHER NOTICE** that the TCC and the Debtors have resolved all  
13 issues listed on Exhibit 2 to the Objection, including issue number 4, regarding “the amount of the  
14 Reorganized Debtors’ common stock to be transferred to the Fire Victim Trust is determined by a  
15 calculation involving the Debtors’ ‘Normalized Estimated Net Income’ (‘**NNI**’) for 2021”; and

16       **PLEASE TAKE FURTHER NOTICE** that the TCC hereby withdraws its Objection; and

17       **PLEASE TAKE FURTHER NOTICE** that the TCC reserves all rights with respect to any  
18 amended version of the Confirmation Order or Plan that the Debtors may file, including but not  
19 limited to any language that pertains to the issues raised in the TCC’s Reply, and any other plan  
20 objections raised by other parties in interest.

21 Dated: June 12, 2020

22  
23 BAKER & HOSTETLER LLP

24 By: /s/ Robert A. Julian  
Robert A. Julian

25 *Counsel to the Official Committee of Tort*  
26 *Claimants*